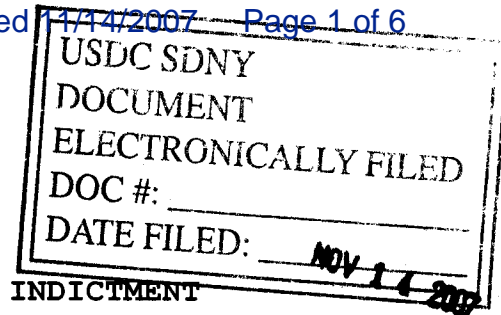


JUDGE KAPLAN



UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

DORRELL GRANT,

Defendant.

07 Cr. \_\_\_\_\_

07 CRIM1045

COUNT ONE

(Interstate Transportation of Stolen Property)

The Grand Jury charges:

Background

1. At all times relevant to this Indictment, DORRELL GRANT, the defendant, was employed at First American Title Insurance Company of New York ("First American" or "the company"), a title insurance company located in Manhattan.

2. At all times relevant to this Indictment, as part of his duties at First American, DORRELL GRANT, the defendant, was responsible for ordering office supplies and services from various vendors, obtaining approval from management for invoices, and submitting those invoices for payment.

The Scheme

3. From at least in or about November 2004 through in or about November 2007, DORRELL GRANT, the defendant, engaged in a scheme to steal at least approximately \$2 million from his employer, First American, by submitting fraudulent invoices for office supplies and services, from a company he controlled called

Graceco Solutions, Inc., ("Graceco"). After stealing the money and depositing it into a bank account in Graceco's name (the "Graceco account"), GRANT then transferred a portion of the stolen funds to a bank account in Jamaica (the "Jamaica account").

4. As part of the scheme, DORRELL GRANT, the defendant, controlled Graceco, a New York corporation, for which he is listed as the Chairman or Chief Executive Officer. The address provided to the New York Secretary of State for Graceco was the then-home address of GRANT.

5. As a further part of the scheme, from at least in or about November 2004 through in or about November 2007, DORRELL GRANT, the defendant, submitted approximately 1,400 invoices to First American from Graceco. The invoices purported to reflect bills for office supplies, catering services, and painting services. In truth and in fact, however, and as GRANT well knew, Graceco did not provide these good or services to First American.

6. After receiving the fraudulent invoices that DORRELL GRANT, the defendant, submitted, First American made payments, by check, to Graceco. From November 2004 through November 2007, these payments totaled approximately at least \$2 million.

7. Upon receiving payments from First American on the fraudulent invoices he had submitted, DORRELL GRANT, the defendant, deposited the fraudulently obtained payments into the

Graceco account, which he controlled. GRANT then transferred a portion of the funds, totaling at least approximately \$350,000 from November 2004 through November 2007, to the Jamaica account. Before transferring the fraudulently obtained funds overseas, GRANT sometimes transferred the money to bank account held in the name of another company he controlled, Prospect Operating Company, for which he is listed as the Chairman or Chief Executive Officer.

Statutory Allegation

8. From in or about November 2004 up to and including on or about November 1, 2007, in the Southern District of New York and elsewhere, DORRELL GRANT, the defendant, unlawfully, knowingly, and wilfully did transport, transmit, and transfer in interstate and foreign commerce goods, wares, merchandise, securities and money, of the value of \$5,000 and more, knowing the same to have been stolen, converted, and taken by fraud, to wit, GRANT, while in the Southern District of New York, carried out a scheme to defraud his employer, First American, by submitting fraudulent invoices for office supplies and services from a company that he controlled, Graceco, and subsequently transferred a portion of the fraudulently obtained funds to a bank account in Jamaica.

(Title 18, United States Code, Sections 2314.)

FORFEITURE ALLEGATION

9. As the result of committing the transportation of

property taken by fraud offense, in violation of Title 18, United States Code, Sections 2314, alleged in Count One of this Indictment, DORRELL GRANT, the defendant, shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461, all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of the offense, including, but not limited to, a sum of money equal to at least \$2 million in United States currency, representing the amount of proceeds obtained as a result of the charged fraud offense.

Substitute Asset Provision

10. If any of the above-described forfeitable property, as a result of any act or omission of the defendant, DORRELL GRANT:


- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third person;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C.

§ 853(p), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Section 981, Title 28, United States Code, Section 2461, and Title 18, United States Code, Section 2314).

  
FOREPERSON

  
MICHAEL J. GARCIA  
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

---

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

---

UNITED STATES OF AMERICA

- v. -

DORRELL GRANT,

Defendant.

---

INDICTMENT

07 Cr.

(Title 18, United States Code,  
Section 2314)

MICHAEL J. GARCIA  
United States Attorney.

A TRUE BILL

  
Foreperson.

---

*Nov 14, 2007*

*Indictment Filed*

*Case assigned to Judge Kaplan.*

*Freeman, USMJ*